

EXECUTIVE SECRETARIAT
ROUTING SLIP

TO:

		ACTION	INFO	DATE	INITIAL
1	DCI				
2	DDCI				
3	EXDIR				
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7	DDO				
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9	Chm/NIC				
10	GC				
11	IG				
12	Compt				
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14	D/OLL				
15	D/PAO				
16	SA/IA				
17	AO/DCI				
18	C/IPD/OIS				
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SUSPENSE		Date			

Remarks

3637 (10-81)

Executive Secretary

8/23/84

Date



DEFENSE INTELLIGENCE AGENCY
WASHINGTON, D.C. 20301

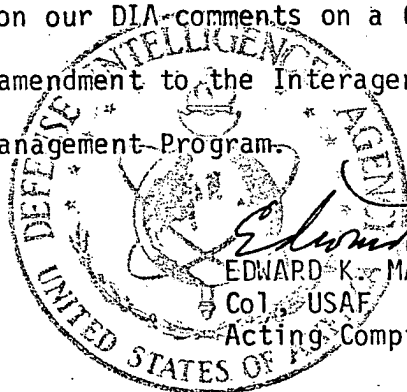
22 Aug 84

STAT

TO:
DCI Executive Secretary
CIA

STAT

In response to a request by
at the IC Staff, I am forwarding for your
information our DIA comments on a GSA
proposed amendment to the Interagency
Reports Management Program.



Edward K. Mann
EDWARD K. MANN
Col, USAF
Acting Comptroller

DCI
EXEC
REG

L-278

Executive Registry

84 - 7061



DEFENSE INTELLIGENCE AGENCY
WASHINGTON, D.C. 20301

14 Aug 84

TO: CIA
NSA
IC Staff

The attached is provided for your information.

In our view, the seemingly innocuous GSA procedure, if enacted as proposed, would present intelligence activities with a choice between (a) a burdensome compliance effort that sanitization requirements would in many cases render meaningless, or (b) conscious disregard, which might be viewed as another manifestation of "maverick" intelligence agencies flouting the rules. We think the proper resolution is a forthright exemption.

Copies of CIA and NSA views on this Federal Regulation would be appreciated. Please address them to DIA/RCC-3.


EDWARD K. MANN
Col, USAF
Acting Comptroller

cc:
DIA General Counsel



DEFENSE INTELLIGENCE AGENCY
WASHINGTON, D.C. 20301

14 AUG 1984

U-313/RCC-3

MEMORANDUM FOR THE DIRECTOR FOR INFORMATION RESOURCES MANAGEMENT SYSTEMS,
OASD(C)(MS)

SUBJECT: Proposed GSA Amendment to FPMR 101-11.11, "Interagency Reports Management Program"

Reference: Dir IRMS, OASD(C)(MS) memo, 27 Jul 84, same subject.

1. The reference requests comments on subject amendment to the Federal Property Management Regulation (FPMR).
2. Defense Intelligence Agency mission performance would be degraded by imposition of the interagency reporting requirements review procedure set forth in subject FPMR amendment. This Agency fully appreciates the need to eliminate wasteful and redundant federal reporting practices, and we support the intent of the regulation. However, procedures conceived with reference to managerial and administrative reporting should not be inappropriately extended into the intelligence function. Effective accomplishment of the intelligence mission argues against application of GSA procedures to organizations dedicated to the collection, management, and dissemination of national intelligence.
3. The proposed FPMR amendment should provide an exemption for reports prepared for use within the intelligence community. This would be consistent with exemptions extant for intelligence missions and systems in the Warner Amendment (10 USC 2315) and the Paperwork Reduction Act of 1980 (44 USC 3502, 3518). The sense of those legislative enactments is to recognize that intelligence information management does not follow conventional methods of information resources management. Specifically, the intelligence community must cultivate multiple sources of data in order to test information by corroboration, must restrict dissemination to conceal the extent of information holdings, and must purposely compartment information to protect sources. Clearing intracompany reporting requirements through GSA's Interagency Operating Programs Branch would disseminate information about intelligence activities to a place where there is no need to know, and would run counter to the methodology used to maintain security over highly sophisticated intelligence information systems.
4. In order to accommodate the concerns expressed above, it is recommended that the following statement be included in FPMR, Section 101-11.1110-1, Exemptions: "Interagency reports exchanged among organizations of the national intelligence community and of an intelligence or intelligence-support nature are exempted from the provisions of Subpart 101-11.11. Not excluded from compliance under this exemption are reports of a routine administrative and business nature whose information content is devoid of intelligence-related material."

5. The Agency point of contact for this subject is Mr. Frank Frizzell, telephone 697-9984.

FOR THE DIRECTOR:


EDWARD K. MANN
Col, USAF
Acting Comptroller